

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

RACHELLE COLVIN, individually and as next friend of minor Plaintiff, G.D., and DANIELLE SASS, individually and as next friend of minor Plaintiff, L.C., and on behalf of all others similarly situated,

Plaintiffs,  
v.

ROBLOX CORPORATION, SATOZUKI LIMITED B.V., STUDS ENTERTAINMENT LTD., and RBLXWILD ENTERTAINMENT LLC,

Defendants.

Case No. 3:23-cv-04146-VC

**SUPPLEMENTAL JOINT CASE MANAGEMENT CONFERENCE STATEMENT**

Judge: Hon. Vince Chhabria

Date: April 18, 2024

Time: 2:00 PM

Courtroom: By Videoconference

Plaintiffs Rachelle Colvin, G.D., Danielle Sass, L.C., and Defendant Roblox Corporation (“Roblox”), together, the Parties, submit this supplemental joint statement in advance of the case management conference (“CMC”) scheduled for April 18, 2024, to provide two updates. First, they write to advise the Court that the parties in this action and in the related action, *Gentry et al. v. Roblox Corp. et al.*, Case No. 3:24-cv-01593-VC, do not oppose consolidation. See Case No. 3:23-cv-04146-VC, ECF Nos. 72, 73 (relating case and postponing ruling on consolidation until after the April 18, 2024, case management conference). And second, if the Court consolidates these actions, the parties are amenable to one of the below proposed schedules. These schedules are the same as those proposed in the joint statement in *Colvin*, the first-filed case, see ECF No. 75 at 14, but now include an agreed-upon requirement for the plaintiffs to file a consolidated complaint.

| Event   | Defendant's Proposal | Plaintiffs' Proposal |
|---|----------------------|----------------------|
| <b>Deadline for <i>Colvin</i> and <i>Gentry</i> Plaintiffs to File Consolidated Complaint</b> | May 2, 2024          | April 23, 2024       |
| <b>Deadline for Roblox to Respond to Consolidated Complaint</b>                               | June 6, 2024         | May 14, 2024         |
| <b>Deadline to Pursue ADR</b>   | August 16, 2024      | July 18, 2024        |
| <b>Disclosure of Primary Class Certification Experts and Expert Reports</b>                   | October 31, 2024     | October 31, 2024     |
| <b>Disclosure of Class Certification Rebuttal Experts and Reports</b>                         | January 29, 2025     | December 2, 2024     |
| <b>Close of Class Certification Expert Discovery</b>  | March 23, 2025       | March 23, 2025       |
| <b>Motion for Class Certification</b>   | March 31, 2025       | March 31, 2025       |
| <b>Opposition to Class Certification</b>  | May 30, 2025         | April 30, 2025       |
| <b>Reply Supporting Class Certification</b>   | June 30, 2025        | May 21, 2025         |

| Event   | Defendant's Proposal  | Plaintiffs' Proposal      |
|---|---|---------------------------|
| <b>Hearing on Class Certification</b>         | July 30, 2025, or at the Court's convenience  | At the Court's discretion |
| <b>Close of Fact Discovery</b>                | Per the Court's instructions at the February 23, 2024 Case Management Conference, Roblox has reserved the remaining deadlines to be determined at a later date. | June 27, 2025             |
| <b>Disclosure of Trial Experts</b>            |   | July 25, 2025             |
| <b>Disclosure of Rebuttal Trial Experts</b>   |   | August 25, 2025           |
| <b>Close of Trial Expert Discovery</b>        |   | September 26, 2025        |
| <b>Dispositive Motion Deadline</b>            |   | October 10, 2025          |
| <b>Oppositions to Dispositive Motions</b>     |   | November 10, 2025         |
| <b>Replies Supporting Dispositive Motions</b> |   | December 1, 2025          |
| <b>Hearing on</b>                             |   | At the Court's            |

| Event                      | Defendant's Proposal | Plaintiffs' Proposal |
|----------------------------|----------------------|----------------------|
| <b>Dispositive Motions</b> |                      | discretion           |
| <b>Pretrial conference</b> |                      | January 5, 2026      |
| <b>Trial</b>               |                      | January 12, 2026     |

Respectfully submitted,

/s/ James Bilsborrow  
 James Bilsborrow (*pro hac vice*)  
 Aaron Freedman (*pro hac vice*)  
 WEITZ & LUXENBERG PC  
 700 Broadway  
 New York, NY 10003  
 (212) 558-5500  
[jbilsborrow@weitzlux.com](mailto:jbilsborrow@weitzlux.com)  
[afreedman@weitzlux.com](mailto:afreedman@weitzlux.com)

Andre Mura (SBN 298541)  
 Hanne Jensen (SBN 336045)  
 Ezekiel Wald (SBN 341490)  
 Jacob Seidman (SBN 347953)  
 GIBBS LAW GROUP LLP  
 1111 Broadway  
 Oakland, CA 94607  
 (510) 350-9700  
[amm@classlawgroup.com](mailto:amm@classlawgroup.com)  
[hj@classlawgroup.com](mailto:hj@classlawgroup.com)  
[zsw@classlawgroup.com](mailto:zsw@classlawgroup.com)  
[jms@classlawgroup.com](mailto:jms@classlawgroup.com)

Christopher D. Jennings (*pro hac vice*)  
 Tyler B. Ewigleben (*pro hac vice*)  
 JENNINGS PLLC  
 PO Box 25972  
 Little Rock, AR 72221  
 (317) 695-1712  
[chris@jenningspllc.com](mailto:chris@jenningspllc.com)  
[tyler@jenningspllc.com](mailto:tyler@jenningspllc.com)

*Attorneys for Plaintiffs*

/s/ Tiana Demas  
COOLEY LLP  
TIANA DEMAS\*  
(tdemas@cooley.com)  
110 N. Wacker Drive, Suite 4200  
Chicago, IL 60606-1511  
+1 312 881 6500 phone  
+1 312 881 6598 fax

KRISTINE A. FORDERER (278745)  
(kforderer@cooley.com)  
KYLE C. WONG (224021)  
(kwong@cooley.com)  
K.C. JASKI (334456)  
(kjaski@cooley.com)  
3 Embarcadero Center, 20th Floor  
San Francisco, California 94111-4004  
Telephone: +1 415 693 2000  
Facsimile: +1 415 693 2222

ROBBY L.R. SALDAÑA\*  
(rsaldana@cooley.com)  
1299 Pennsylvania Avenue, NW, Suite 700  
Washington, D.C. 20004-2400  
Telephone: +1 202 842 7800  
Facsimile: +1 202 842 7899

*Attorneys for Defendant Roblox Corporation*

(\*Admitted *Pro Hac Vice*)

**ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatory.

/s James Bilsborrow